



GLOBAL CAPITAL LAW  
Gary Harre, SBN 86938  
Diane Beall, SBN 86877  
8700 Warner Avenue, Suite 200  
Fountain Valley, CA 92708  
Telephone: (714) 907-4182  
Facsimile: (714) 907-4175

Attorneys for Debtor

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF CALIFORNIA  
FRESNO DIVISION

In re:	)	Case No. 10-64039
	)	
JAMES GIBBS,	)	Chapter 7
	)	
	)	DCN: GCL-1
	)	
Debtor	)	<b>NOTICE OF MOTION FOR AN ORDER</b>
	)	<b>EXTENDING THE DEADLINE TO FILE</b>
	)	<b>OBJECTION TO DISCHARGE UNTIL</b>
	)	<b>JUNE 30, 2011</b>
	)	
	)	<b>[FRBP 4007(c)]</b>
	)	
	)	Date: April 22, 2011
	)	Time: 9:00 a.m.
	)	Place: Courtroom 11
	)	2500 Tulare Street
	)	Fresno, CA 93721

**TO THE HONORABLE WHITNEY RIMEL, UNITED STATES BANKRUPTCY  
JUDGE; SHERYL ANN STRAIN, CHAPTER 7 TRUSTEE; AND TO ALL OTHER  
INTERESTED PARTIES:**

**PLEASE TAKE NOTICE** that a hearing on the Motion for an Order Extending the  
Deadline to file Objection to Discharge until June 30, 2011, will be heard in Courtroom 11,  
before the Honorable Whitney Rimel in the United States Bankruptcy Court, located at 2500  
Tulare Street, Fresno, CA 93721 on April 22, 2011 at 9:00 a.m.

///

**NOTICE OF MOTION FOR AN ORDER EXTENDING THE DEADLINE TO FILE  
OBJECTION TO DISCHARGE UNTIL JUNE 30, 2011**

1 This Motion is based on the Motion for an Order Extending the Deadline to file  
2 Objection to Discharge until June 30, 2011, the Declaration of James Gibbs, filed concurrently  
3 herewith and on such further evidence and oral arguments that may be presented at the hearing in  
4 this matter.

5 **PLEASE TAKE FURTHER NOTICE** that the Notice and Motion are being made  
6 pursuant to Local Bankruptcy Rule 9014-1 and Federal Rules of Bankruptcy Procedure 4007(c).  
7 Opposition, if any, shall be filed not later than **14 days before the date set for the hearing** and  
8 the failure to timely file an opposition to the motion may be deemed by the Court to be consent  
9 to the granting of the Motion.

10 Respectfully submitted.

11  
12 Dated: March 8, 2011

**GLOBAL CAPITAL LAW**

13  
14 /s/ Gary Harre \_\_\_\_\_  
15 Gary Harre, Esq.  
16 Diane Beall, Esq.  
17 Attorneys for Debtor JAMES GIBBS  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28